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Roger W. Bailey
Director
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APR 19 1995

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April 18, 1995

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: ET Docket No. 95-19, Equipment Authorization Requirements for Digital Devices

Dear Sir or Madam:

Enclosed are an original and nine copies of Dell Computer Corporation's comments on the Proposed Rule Making referenced above. Please file these comments in this proceeding, and provide each Commissioner with a copy.

Very truly yours,

Roger W. Bailey

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(APR 19 1995)

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April 14, 1995



Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

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Re: ET Docket No. 95-19, Equipment Authorization Requirements for Digital Devices

Dear Sir or Madam:

This letter contains Dell Computer Corporation's ("Dell") comments on the Proposed Rule Making adopted February 7, 1995, entitled In the Matter of Amendment of Parts 2 and 15 of the Commission's Rules to Deregulate the Equipment Authorization Requirements for Digital Devices. Dell is a manufacturer and marketer of personal computers, and changes to the existing regulatory scheme will have a significant impact on its business and operations.

In summary, Dell strongly supports the Commission's proposal for an equipment manufacturer's and supplier's Declaration of Compliance ("DoC") in place of the present certification process. The proposal is consistent with the direction similar agencies in other countries are taking or have already adopted. This proposal will reduce costs and allow new technologies and products to reach the marketplace sooner, both of which improve competitiveness and benefit the consumer. Dell opposes, however, the Commission's proposals to (i) require that manufacturers and suppliers obtain National Voluntary Laboratory Accreditation Program ("NVLAP") accreditation of their test sites and (ii) permit modular certification of personal computers based on certification of certain component parts.

Equipment Authorization Requirements

Dell strongly supports the Commission's proposal for equipment manufacturers and suppliers to test their product to ensure compliance with the Commission's standards for limiting RF emissions and to include a DoC with the literature furnished with the equipment. Dell recommends that a copy of the DoC be furnished to the Commission in all cases rather than only on request, as in the Commission's proposal. In this way, the Commission will remain knowledgeable of current product offerings and market trends without a large time investment on their part or increased cost to the manufacturer or supplier.

Dell also supports the Commission's proposal to require some sort of product labeling to indicate compliance with the Commission's rules on RF emissions. This label should be a small logo because of the space constraints that frequently occur on product labels. Dell has no suggestion as to the actual logo itself. Dell supports the Commission's proposal that such labeling be in addition to the current requirement to provide information to the user on steps to be taken in the event the equipment causes interference.

Dell is opposed to the Commission's proposal to require NVLAP accreditation of all labs testing personal computers and peripherals for the purpose of issuing DoC's. The Commission's current site registration program has proven effective and should be continued. Today, computer manufacturers bear final responsibility for compliance with the Commission's standards and have developed the expertise to measure, control and suppress emissions from their products. And the Commission always has the right to test equipment and to audit labs to confirm compliance. Requiring NVLAP accreditation only increases

the burden on the manufacturer without improving the end product or benefiting the buyer. Dell would bring to the attention of the Commission that Japan's VCCI process and Europe's CE process are similar to the process proposed by the Commission, and both are effective without requiring any test site approval other than their own.

Of the three alternative approaches proposed by the Commission, Dell would support the second and third alternatives. Both of these alternatives meet the expressed intent of the Commission by eliminating the marketing delay inherent in the current process. Streamlining the current process to reduce processing time is not a viable alternative, in Dell's opinion, because the Commission remains in a reactive mode and future budget or staffing changes could negate any initial time reductions.

Authorization of Modular Personal Computers

Dell is strongly opposed to the Commission's proposal to grant modular certification of personal computers. Compliant CPU boards, power supplies and enclosures do not ensure a compliant personal computer. Dell's testing has established that cable routings, alone, can cause +/- 10dB in emissions from a completely assembled personal computer, and we welcome the opportunity to share those test results with the Commission. Chassis mating surfaces, gaskets and grounding finger placement, among other factors, are also critical in total system emissions compliance.

The Commission's Notice of Proposed Rule Making recognizes the complexities of controlling emissions due to the interactions among the CPU board, power supply, enclosure, cabling, and other subassemblies and components. That many CPU boards may accept microprocessors operating at different clock speeds or from different manufacturers is a further complicating factor. A personal computer assembled from compliant modules is not assured of compliance with the Commission's standards. To allow manufacturers to issue a DoC based on modular compliance grants such manufacturers a significant competitive advantage over those who design and test for full system compliance and may lead to the proliferation of non-compliant personal computers and increasing instances of interference, both in the work place and the home.

The one area where modular compliance testing seems justifiable is power supplies. Like the Commission, Dell has found that the design of the power supply itself is determinative of the amount of emissions conducted onto the AC power lines, with little interaction with the other components of the fully-assembled personal computer.

Conclusion

Dell strongly supports the Commission's proposal to replace the present emissions certification process with a Declaration of Compliance by the equipment manufacturer. We urge the Commission to retain the current test site registration process and oppose a requirement that laboratories receive NVLAP accreditation in order to issue a DoC. Dell strongly opposes modular certification of personal computers because emissions control is extremely complex and the interactions among components cannot be accurately modeled or predicted. Relaxation of the requirements for full system testing and compliance will create an uneven playing field among computer manufacturers and may lead to a dramatic increase in the number of non-compliant systems entering the marketplace.

Respectfully submitted,



Eric Harslem
Senior Vice President, Product Group